



April 7, 2006

Mr. Bill Brattain
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114
bbrattain@waterboards.ca.gov

Subject: Comments to the Draft GWGO

Dear Mr. Brattain:

Sonoma Compost Company thanks you for the opportunity to provide comments on the Draft GWGO. We are in support of your efforts to address the void left after the compost waiver of WDRs sunset on 1 January 2003. However, we have concerns with the proposed Draft GWGO. The General Order is prescriptive in nature and as a result does not reflect the wide range of potential *impact in the Region*.

We encourage you to open discussion to evaluate the need for the proposed requirements. While we are in favor of protecting the ground and surface waters, we also believe that the economic viability of the composting industry must be protected through an appropriately measured GWGO based on relevant data coupled with dynamic, flexible solutions such as site specific Best Management Practices.

The GWGO has a compliance deadline of October, 2007. This deadline may not be feasible if stringent requirements are placed on compost facilities. We suggest that the deadline for compliance will be linked to a realistic timeframe of implementation taking in consideration time to design, obtain permits and construct.

We urge the Board to hold hearings before the implementation of the GWGO to utilize expertise and insights of all parties involved. Sonoma Compost looks forward to work with you in a constructive manner to work towards appropriate solutions. We appreciate the Water Board's efforts to address concerns and comments on the Draft GWGO. Please feel free to contact me with any further questions or for information.

Sincerely,

Will Bakx
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